

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

UNITED STATES OF AMERICA,

Plaintiff,

vs.

DAVID REID, et al.,

Defendants.

Case No.: CR05-1849 JH

(EXPEDITED RULING REQUESTED)

**UNOPPOSED MOTION BY DEFENDANT DAVID REID TO
BE PERMITTED TO TRAVEL OUT OF STATE**

Defendant, David Reid, by and through undersigned counsel, hereby moves this Honorable Court to enter an Order permitting him to travel out of the state of Arizona from November 28, 2005 to December 16, 2005. The grounds for this Motion are:

1. Pursuant to the current terms and conditions of release, Mr. Reid is prohibited from traveling out of the state of Arizona unless approved by the Court.
2. Mr. Reid would like to travel to Oregon from November 28, 2005 to December 16, 2005 in order to assist his elderly mother move and also to provide networking services to a customer in Newburg, Oregon.
3. Undersigned counsel contacted Assistant United States Attorney General James Braun on November 21, 2005 and he stated that he has no objection to Mr. Reid's request.

4. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in New Mexico, Sandra Avila Toledo, on November 21, 2005 and left a voice mail message regarding Mr. Reid's request. On November 22, 2005, Ms. Toledo contacted undersigned counsel's office and stated she has no objection to Mr. Reid's motion.

5. Undersigned counsel contacted Mr. Reid's assigned Pre-trial Services Agency Officer in Arizona, Jose Valencia, on November 21, 2005 and he stated that he has no objection to Mr. Reid's request.

Based on the foregoing, Mr. Reid requests this Honorable Court enter an Order permitting him to travel to Oregon from November 28, 2005 to December 16, 2005.

RESPECTFULLY SUBMITTED this 22nd day of November,
2005.

/s/ electronically signed

ZUBAIR ASLAMY
Attorney for Defendant Reid
1414 W. Broadway Road, Suite 122
Tempe, Arizona 85282
(480) 968-8700

I hereby certify that a true and correct copy of the foregoing was filed electronically with the court and faxed to the Assistant United States Attorney and mailed to the following this 22nd day of November, 2005.

/s/ electronically signed

Sandra Avila Toledo
Pretrial Services Agency—New Mexico
333 Lomas Blvd. NW, Suite 120
Albuquerque, NM 87102

Jose Valencia
U.S. Pretrial Services Agency—Arizona
405 W. Congress Street
Tucson, Arizona 85701

Jerry Daniel Herrera
620 Roma Avenue, NW
Albuquerque, New Mexico 87102

This document was created with Win2PDF available at <http://www.win2pdf.com>.
The unregistered version of Win2PDF is for evaluation or non-commercial use only.